

EXHIBIT F

SNMP RESEARCH, INC., et al.vs. BROADCOM INC., et al.

TRANSCRIPT OF PROCEEDINGS

March 17, 2021

<p style="text-align: right;">Page 5</p> <p>1 positions as stated in the motions and in our 2 objections.</p> <p>3 But if you requested to meet and confer 4 and offered to discuss whether or not you're going 5 to reconsider your position on the waiver issue, we, 6 obviously, are willing to listen to that.</p> <p>7 But just your opening question, we're 8 not here today to start negotiating against 9 ourselves. And normally you would have sent a meet 10 and confer letter laying out your position with 11 supporting case law and to -- since you have the 12 burden to support the appropriateness of your 13 request. That's what we were expecting to hear. So 14 I want to make that clear, that we're not -- we're 15 not changing our position with respect to what's 16 already been fully set forth.</p> <p>17 Obviously, we'll consider what you have 18 to say today. But as I indicated in that email, 19 since we don't have any idea what that is or whether 20 or not you are actually going to change your 21 position on the one side of discovery issue, that is 22 to us -- that is a threshold issue.</p> <p>23 MR WOOD: Matt, do you want to jump in? 24 MR. ASHLEY: Yes. Can you guys hear me? 25 THE REPORTER: Yes, sir.</p>	<p style="text-align: right;">Page 7</p> <p>1 we're happy to talk through if you want to give 2 supporting case law for your request and why you 3 think all of our objections aren't valid. But we're 4 never -- I don't know what you -- I don't know how 5 you are separating those two things in your mind 6 because one of our objections is, in fact, that 7 we've got these motions pending. So we can't really 8 separate them.</p> <p>9 MR. ASHLEY: Well, I think you can. I 10 think you guys have a motion to stay and for 11 protective order. The parties met and conferred 12 before that was filed. The parties disagree on that 13 issue. And it's fully briefed.</p> <p>14 We also have the request for production 15 of sales. We have propounded them. It's 16 defendants' positions that they have provided 17 substantive responses consisting of objections so we 18 are trying to work out the issues with respect to 19 those objections.</p> <p>20 I don't think either party has to 21 concede any position on the motion to stay and for 22 protective order. And it sounds like you are 23 willing to meet and confer on the requests for 24 production. You just want us to send you a meet and 25 confer letter. But I don't think there's any</p>
<p style="text-align: right;">Page 6</p> <p>1 MR. ASHLEY: Good. This is Matt Ashley. 2 So, Alison, what happened was we sent a meet and 3 confer letter to you asking if you wanted to have a 4 meet and confer over the second request for 5 production. I thought you responded yes but you 6 also wanted us to meet and confer with you over the 7 already-filed motion to stay and for a protective 8 order. We are happy to do that, but we don't view 9 those as antithetical to each other. You can do 10 both.</p> <p>11 Are you saying that you won't meet and 12 confer over the second set of RFPs today?</p> <p>13 MS. PLESSMAN: Well, to me they're not 14 separate issues. Because our objections are that -- 15 include that we have a pending motion for protective 16 order and to stay discovery and so -- and you 17 haven't sent a letter. You could always send a 18 letter to meet and confer in advance and lay out 19 your position with respect to the specific 20 objections but you haven't done that.</p> <p>21 So all we're saying is we're happy to 22 hear you out but we're assuming that you're going to 23 have as part of this some different position on the 24 waiver issue because all of those things have 25 been -- have been briefed. There's -- you know,</p>	<p style="text-align: right;">Page 8</p> <p>1 requirement that we do that before we actually just 2 start talking through what the issues are.</p> <p>3 I think what John was trying to do was 4 John was just trying to short circuit this because 5 there are quite a few objections and some of them 6 might not be as big an issue as others.</p> <p>7 So, for instance, you incorporate by 8 reference general objections. Those general 9 objections cover a very wide array of objections, 10 many of which might not be applicable to request for 11 production number 92. So we just wanted to narrow 12 the field so to speak. And then we might be able to 13 reach agreement on some of these issues. And if we 14 don't, then I guess the parties could exchange 15 letters. But I thought right now the point of 16 meeting and conferring is to be efficient so we 17 could streamline the objections that are truly at 18 issue, try to reach an agreement on them. And if we 19 don't, if you'd like us to exchange letters, I 20 suppose we could but we may not have to because we 21 might reach agreement.</p> <p>22 MS. PLESSMAN: Yeah. You can assume for 23 the purposes of this discussion that at this point 24 we're standing on all of our objections because we 25 don't have any reason not to.</p>

<p style="text-align: right;">Page 9</p> <p>1 So my expectation when somebody asks for</p> <p>2 a meet and confer in response to another party's</p> <p>3 motions and full objections is to come and say this</p> <p>4 is why you're wrong and we're willing to listen to</p> <p>5 that. But because we don't know what that is, I</p> <p>6 guess my easy answer would be at this point we're</p> <p>7 standing on all of our objections rather than trying</p> <p>8 to go through and say, no, this one we didn't really</p> <p>9 mean or this one we care about less. We put them in</p> <p>10 there for a reason.</p> <p>11 MR. ASHLEY: We could do that. We could</p> <p>12 go general objection number one and start with that.</p> <p>13 Some of these just don't seem -- oh, I'm sorry. Go</p> <p>14 ahead.</p> <p>15 THE REPORTER: Is this Matt?</p> <p>16 MR. ASHLEY: This is Matt. Yes, I'm</p> <p>17 sorry. I guess we could do that. We could just</p> <p>18 start. There's a lot of general objections and</p> <p>19 there's a lot of objections written here that just</p> <p>20 on their face don't look like they're the type that</p> <p>21 would withhold production of documents but we're</p> <p>22 willing to do that.</p> <p>23 So I guess we could just start with the</p> <p>24 first general objection if that's how you want to do</p> <p>25 it. It doesn't seem very efficient.</p>	<p style="text-align: right;">Page 11</p> <p>1 discussions and meet and confers and responding to</p> <p>2 motions to compel. And that's exactly why you file</p> <p>3 a motion for a protective order.</p> <p>4 So I think that is -- that's an</p> <p>5 important issue to discuss because if you're not</p> <p>6 really willing to reconsider that, that makes</p> <p>7 this -- and then you ask us to go through item by</p> <p>8 item and further support the objections that we've</p> <p>9 already set forth without giving us anything in</p> <p>10 response, that just doesn't -- again, that just</p> <p>11 doesn't seem fair.</p> <p>12 MR. ASHLEY: Well, we could start</p> <p>13 with -- I know that you raised the issue of whether</p> <p>14 or not defendants or the plaintiffs would discuss</p> <p>15 with defendants reconsideration with respect to the</p> <p>16 already briefed motion to stay and for a protective</p> <p>17 order.</p> <p>18 It sounds like from what you said</p> <p>19 earlier defendants' position on that is firm. We</p> <p>20 did meet and confer with you on that. But if</p> <p>21 there's something new that you want to raise that</p> <p>22 hasn't already been raised in the briefing -- I</p> <p>23 think it's been pretty extensively briefed but if</p> <p>24 there's something new that you would like us to</p> <p>25 factor in in connection with your request that we</p>
<p style="text-align: right;">Page 10</p> <p>1 MS. PLESSMAN: What I'm really looking</p> <p>2 for is just what is your -- what is -- rather</p> <p>3 than -- I feel like you're flipping the burden on us</p> <p>4 and we have a motion for a protective order. We've</p> <p>5 served our objections and now you want us to provide</p> <p>6 the basis as I believe we already have.</p> <p>7 But if you disagree, I would say then</p> <p>8 I -- I'm -- then we're here to listen to what you</p> <p>9 have to say about our objections. But to go through</p> <p>10 and have for me to be the one going on speaking and</p> <p>11 going through objection by objection when we've</p> <p>12 already I think pretty fully explained and objected</p> <p>13 to each request, that's what I'm -- that's what I'm</p> <p>14 responding to. I mean, especially you guys are, in</p> <p>15 this sort of like informal type of conversation, you</p> <p>16 guys are requesting a court reporter, and then</p> <p>17 asking me to be the only one speaking, and you guys</p> <p>18 are the ones that requested the meet and confer.</p> <p>19 So I'm assuming you have a position and</p> <p>20 you have a response in support for your, you know,</p> <p>21 legal support for your request and we're willing to</p> <p>22 listen. And I also was assuming and understood that</p> <p>23 you are willing to reconsider a huge piece of this</p> <p>24 which is that we shouldn't have to engage in</p> <p>25 one-sided discovery which includes extensive</p>	<p style="text-align: right;">Page 12</p> <p>1 reconsider our position, we're happy to consider.</p> <p>2 MS. PLESSMAN: Well, I mean, the issue</p> <p>3 is that it's -- it is an impediment to be able to</p> <p>4 move forward and so that -- it simply -- are you --</p> <p>5 given -- given where we are, are you willing to, in</p> <p>6 an effort to move things forward, while we wait for</p> <p>7 these motion to dismiss to be resolved, are you</p> <p>8 willing to change your position regarding the</p> <p>9 argument that you're entitled to reserve -- or not</p> <p>10 entitled, but that you are reserving your right to</p> <p>11 argue that we are waiving jurisdictional and venue</p> <p>12 defenses by engaging in our own discovery? Has your</p> <p>13 position changed on that?</p> <p>14 MR. ASHLEY: No, our position hasn't</p> <p>15 changed. It's fully briefed and I think we've met</p> <p>16 and conferred on that already. But you had proposed</p> <p>17 that we would consider it and I just asked whether</p> <p>18 or not there's anything new beyond what's been</p> <p>19 briefed and what we've already discussed that you</p> <p>20 would like us to consider in connection with that?</p> <p>21 If not, yeah, our position is the same. It's</p> <p>22 actually fully briefed and teed up for the court.</p> <p>23 MS. PLESSMAN: Okay. Well, I think that</p> <p>24 that was -- I think that was a little bit misleading</p> <p>25 because I think it was clear from our request that</p>

<p style="text-align: right;">Page 13</p> <p>1 that was an important consideration for -- that that 2 is -- that's an important consideration and that I 3 view those things as being part of the same 4 conversation as far as meeting and conferring 5 regarding our objections and that -- and that 6 particular issue.</p> <p>7 I took your email to mean that you were 8 actually considering changing your position, not 9 just that you would, you know, require some -- I 10 don't even know what -- additional information. But 11 I guess that's clear. So it sounds like you're 12 continuing to take the position that you will argue 13 waiver if we engage in our own discovery?</p> <p>14 MR. ASHLEY: So to make it really clear, 15 we're not taking any positions with respect to 16 waiver. You have asked previously whether or not we 17 would agree that if you propounded your own 18 discovery and there was a potential for waiver based 19 on that, we would agree not to assert that argument 20 and we're not agreeing to that and we're still not. 21 It sounds like both parties are not willing to 22 reconsider their position on the motion to stay and 23 for a protective order.</p> <p>24 So given that we've reached that point, 25 are you now willing to meet and confer on the actual</p>	<p style="text-align: right;">Page 15</p> <p>1 information to know and, obviously, we are willing 2 to listen to it.</p> <p>3 So I just -- you asked to meet and 4 confer so we don't know what you have in mind, I 5 guess, if you're not willing to change your position 6 at all. It's just a little bit confusing.</p> <p>7 MR. ASHLEY: Yeah. I'm not sure what's 8 confusing about it. But what we are trying to do is 9 have a dialogue about the requests and the 10 objections to narrow the issues in dispute on the 11 objections and try to resolve them if we can.</p> <p>12 So, for instance, if there really is 13 something about this request that's confusing to 14 defendants, we would like to try to clarify. If 15 there's something about this request that's truly 16 unduly burdensome to defendants, we'd like to know 17 how so and then try to reach a compromise where we 18 can alleviate that burden.</p> <p>19 If there is something else, we would 20 just have to guess. Like you've incorporated by 21 reference the tax privilege as an objection to 22 request number 92. If you're not withholding 23 documents based on that, I don't think we have to 24 discuss it. But that would be something that we 25 would say, okay, what is the basis for that and why</p>
<p style="text-align: right;">Page 14</p> <p>1 second set of RFPs, specifically, the objections 2 that you have raised other than that?</p> <p>3 MS. PLESSMAN: Well, I mean, I'm not -- 4 and that's what I am -- we are willing to hear your 5 response to our objections. But we have already 6 laid out our position and so -- and that's what I 7 indicated in our email. We don't know -- we didn't 8 know what your proposal was going to be. We don't 9 know what you're -- whether or not you're -- you 10 would have a specific thing you want to meet and 11 confer about with respect to our request and we're 12 willing to listen.</p> <p>13 But the idea that we're going to waive, 14 just to say our pending motions that we're taking 15 those off the table and we're going to just move 16 forward, that is not our position as long as you 17 maintain that you're entitled to this one-sided 18 discovery, that's going to be a big impediment.</p> <p>19 But that doesn't mean that you can't 20 explain your requests and provide support for them 21 and at some point when we get to -- it gets to that, 22 we obviously will take into consideration your 23 explanations of the request. Maybe, for example, we 24 have interpreted them incorrectly or do you mean "X" 25 and we thought you meant "Y"? It could be helpful</p>	<p style="text-align: right;">Page 16</p> <p>1 can't you produce documents that aren't tax 2 privileged.</p> <p>3 But given the number of objections, it's 4 just going to be inefficient going item by item, but 5 if you'd like to do that we can. But I don't want 6 to do it where you're saying you're just going to 7 hear what we say and then we're not going to work to 8 resolve the issue so that you can provide responses. 9 That's the point of a meet and confer.</p> <p>10 MS. PLESSMAN: I understand. But what 11 you're basically saying is that you asked for a meet 12 and confer and then you want us to explain all of 13 the objections that I feel are clear and we've laid 14 out. A lot of these objections we've actually fully 15 briefed. So I think that since you have requested a 16 meet and confer, I would ask that you set forth why 17 you believe our objections lack merit, why you 18 believe that your request is appropriate. We -- 19 your -- again, it's just a matter of we've already 20 laid out our position and so now we'd like to hear 21 yours as part of the meet and confer that you 22 requested.</p> <p>23 And I feel like you are instead asking 24 us to go through and be the only ones, again, trying 25 to explain our objections which I believe are</p>

<p style="text-align: right;">Page 17</p> <p>1 already clear and have often – we’ve already 2 explained and briefed. 3 So why don’t you, rather than going back 4 and forth about that, I think it would be more 5 productive for you to explain your reaction to our 6 objections and which ones you feel lack merit or 7 which ones you don’t understand and then we can 8 consider those and try to figure out a response. So 9 we don’t know what your response is yet. 10 MR. ASHLEY: John, maybe you can just 11 start with the definitions. That was sort of the 12 focal point, I think, of the briefing and then we 13 can move from there to see if there’s some other 14 objection that we’re not focusing on is somehow a 15 roadblock. Make sense? 16 MR WOOD: I was going to suggest – and 17 we are kind of doing this on the fly – but maybe we 18 start with, I think, the easiest one and see if we 19 can – which is request for production number 96. I 20 think you had the fewest objections there and it 21 seems like we ought to be able to resolve that such 22 that you can produce that document. This is John 23 Wood. 24 So Alison, we’re not – and then maybe 25 we do go back and look at the definitions and go</p>	<p style="text-align: right;">Page 19</p> <p>1 MR. WOOD: So we have a protective order 2 that allows you to produce confidential and highly 3 confidential information, a protective order will. 4 Let’s just say if Extreme doesn’t object 5 to that, are you still going to refuse to produce 6 the document until the motion to stay and for a 7 protective order is resolved? Is that what your 8 objection means? As long as that motion is in 9 place, you’re not going to produce any documents? 10 This is John Wood. Let me repeat my question. 11 So once we get a protective order in 12 place, are you saying that you’re still not going to 13 produce any document because the motion to stay and 14 protective order is in place? 15 MS. PLESSMAN: Well, we served our 16 objections and we served a motion for a protective 17 order and so, I mean, that is typically – it 18 wouldn’t make a whole lot of sense if then we went 19 and produced a bunch of documents when we have a 20 motion for a protective order pending. 21 And so maybe – and, in addition, it’s 22 not just our motion. This request in particular 23 focuses on confidential information with Extreme and 24 Extreme isn’t, for whatever reason, on the line 25 today. And we have a motion that we filed with them</p>
<p style="text-align: right;">Page 18</p> <p>1 through that. But it looks like your main objection 2 to request number 96 is simply that we have no 3 protective order. 4 So could we agree that once we get the 5 protective order in place, will you then be in a 6 position to produce that document? 7 MS. PLESSMAN: Yeah. And we also, 8 obviously, object because there’s a pending motion 9 to stay and for a protective order which is sort of 10 my original point. It doesn’t sound like that issue 11 has gone away so that still exists. 12 The other issue here is I thought that 13 Extreme was going to be on the call and so that, 14 obviously, this request of the issue is 15 confidential – confidential information as between 16 the two parties. So I think it has to be – that 17 has to be a conversation with both of us because it 18 implicates both of us. 19 But, in general, you are correct. It 20 has – the primary objection here is the lack of a 21 protective order and then the attending motion to 22 stay and protective order. But then the position 23 with respect to confidentiality is an issue that I 24 would want to make sure that Extreme agrees with any 25 position that we would take on that.</p>	<p style="text-align: right;">Page 20</p> <p>1 that would equally apply to them. 2 So I think we would need to discuss with 3 Extreme what their position would be with respect to 4 this document. I don’t see it – if all things were 5 resolved, I don’t see this particular document being 6 a huge, huge problem down the road. But where we 7 are now, there are. We don’t have a protective 8 order and we’ve got these pending motions and we’ve 9 got this confidentiality and issues with a joint 10 defendant. 11 So I think we would need to talk to them 12 about it before committing to what we might do down 13 the road once all these issues are resolved. But I 14 don’t think that there should be – this particular 15 document likely wouldn’t be something that is going 16 to be a huge fight once those issues are resolved. 17 I think we need to talk to them about it. 18 MR. ASHLEY: This is Matt. Just one 19 thing. Extreme did respond to this request. And 20 they said: Pending entry of an appropriate 21 protective order and resolution of general 22 objections, in particular the aforementioned 23 objections, the propriety of all requests due to the 24 pending discovery posture and motions, Extreme would 25 have no additional objection to this request to the</p>

<p>Page 21</p> <p>1 extent that it's seeking non-privileged or otherwise 2 unprotected information.</p> <p>3 So I don't think they're objecting on 4 confidentially grounds. I don't know if that 5 resolves the issue.</p> <p>6 MR. PLESSMAN: That's what I would think 7 that that's what that protective order objection 8 would be addressing. And it sounds like they're 9 also -- that they also reference the pending 10 discovery issue. So I really think they should be 11 involved in the conversation with respect to -- with 12 respect to this request.</p> <p>13 But I think that the key issues are the 14 protective order and the issues already involved, 15 just like you would normally do. The issues are 16 involved in the conflict or agreement or whatever 17 the confidentiality issue are on the same page. And 18 then also you have the pending motions, obviously.</p> <p>19 MR. WOOD: This is John Wood again. I 20 think one thing we are trying to figure out, Alison, 21 is which of these objections we really need to 22 respond to. So, for example, it sounds like you're 23 saying you're not withholding this document because 24 of the tax privilege or a constitutional right to 25 privacy or any of that. And so for us -- and you've</p>	<p>Page 23</p> <p>1 a court reporter and then go through and, again, not 2 offer your own support for the request, but having 3 us again through go through and -- and, you know, 4 further explain all of our objections, which if you 5 don't think the tax privilege applies, then you can 6 explain why but -- rather than -- that's where we 7 should be.</p> <p>8 What I'm saying is that I think even 9 went farther with that. I think the key issues 10 there are involving Extreme in the conversation and 11 the resolution of the protective order and the 12 motion. But part of resolving these issues with 13 Extreme include discussions about various privileges 14 and things that might apply to the particular 15 redaction.</p> <p>16 But, given that this involves another 17 party and that they're not on the line, it seems 18 like that particular request isn't a good one to 19 focus on. We could easily have them here as well to 20 figure that out. But as an initial matter, I don't 21 think it's -- what we need to do first is get the 22 protective order and motions resolved because those 23 are, again, threshold issues.</p> <p>24 But I just don't think it's appropriate 25 to ask for a meet and confer and then when we've</p>
<p>Page 22</p> <p>1 made that objection on I think almost every single 2 request, similar objection.</p> <p>3 So we're trying to figure out which ones 4 are really withholding documents so we know what to 5 respond to on and that's why we wanted to talk 6 through it. Because if you really are withholding 7 it based on the tax privilege, we want to understand 8 what you mean by that and how it could be implicated 9 by the tax privilege. Because we don't really even 10 understand your objection.</p> <p>11 And that's the whole point of the meet 12 and confer. If this is a real objection that you're 13 really withholding documents, we need to talk about 14 it and understand why you're withholding a document 15 based on the tax privilege.</p> <p>16 MS. PLESSMAN: Yeah. I understand. But 17 what -- I understand you want us to go through and 18 defend all our objections. And I'm saying that is 19 essentially asking us to negotiate against ourselves 20 when we're the only ones that have laid all of this 21 out in writing and you haven't given us what your -- 22 you haven't given us support for why the requests 23 are appropriate and why our objections are not 24 appropriate. And I just feel like that -- that is 25 the fair sequence of things. Rather than to ask for</p>	<p>Page 24</p> <p>1 already fully set forth our position I think pretty 2 clearly and then not -- not begin by providing your 3 support for your request and why you think -- why 4 you think it's clear and appropriate and makes sense 5 and not overbroad and all of those things. And I'm 6 not just talking about the last request. It raises 7 issues with respect to this Extreme who is not here 8 but with respect to the others.</p> <p>9 MR WOOD: This is John Wood. And just 10 with all due respect, I think you've gotten it 11 somewhat backwards because the rules require you to 12 state with specificity why you have the objection. 13 You can't just say I object because of a 14 constitutional right to privacy. You have to 15 explain why you object. Then we're able to respond. 16 If we don't know the reason -- you keep saying 17 you've laid out all your reasons but you actually 18 haven't. You just say constitutional right to 19 privacy, tax privilege, the Federal Rules of Civil 20 Procedure.</p> <p>21 So are we supposed to go through every 22 single federal rule and explain why it doesn't 23 apply? It's your burden to state with specificity 24 why these objections apply and you haven't done 25 that. We're trying to meet and confer to get some</p>

<p style="text-align: right;">Page 25</p> <p>1 clarity on which objections are real and which ones 2 aren't so we know how to respond so we can clear 3 this up. 4 MS. PLESSMAN: Yeah. And I'm saying 5 that for the purposes of the -- you asked to meet 6 and confer and so we've laid out our objections. 7 And, obviously, we wouldn't have served them if we 8 didn't think that they were appropriate and 9 sufficient. 10 So what I'm saying is that if you don't 11 think they are then, as you just laid out, that's 12 fine, I could respond, so we will consider that. 13 But that's the sort of thing that I'm talking about. 14 If you don't think that our objections with respect 15 to "X", "Y", and "Z" is appropriate, tell us why and 16 we'll consider that, consider whether or not we'll 17 amend our responses. 18 But our position is that our objections 19 are appropriate. And so I understand that you might 20 disagree but that's what we're meeting and 21 conferring about, to find out where you disagree and 22 what you think is insufficient and what you don't 23 think is a valid basis and then you can provide 24 support for that and that's fine. That's what I 25 would expect.</p>	<p style="text-align: right;">Page 27</p> <p>1 what it is that you don't understand, identify where 2 you think our objections are inappropriate, and then 3 we can consider that. But we don't know that yet. 4 That's the problem. 5 And I agree with you, Matt, that you're 6 not required to necessarily send a letter in 7 advance, but that is one of the advantages of doing 8 it because then we're not in the situation where you 9 go into a call specifically where you insist on 10 having a court reporter and identify your problems 11 or objections for the first time and then ask us to 12 explain and support them rather than the other way 13 around, where you explain what it is you don't 14 understand and what we, you know -- what you would 15 request that we provide additional information on or 16 where you would request that we amend our objections 17 where it doesn't make sense to you. Those are the 18 kinds of things that we can consider, but -- but 19 that's not what I'm hearing you do. 20 MR. WOOD: Well, I -- 21 MS. PLESSMAN: Just looking at number 22 one, if you don't want to -- if there is some 23 objection, it kind of works both ways. If there's 24 some objections that you get, that you think makes 25 sense, then you're willing to clarify them, that's</p>
<p style="text-align: right;">Page 26</p> <p>1 MR WOOD: This is John Wood again. 2 Alison, we can't provide support for something when 3 we don't understand the reason for your objection. 4 So back to the tax privilege, how does 5 the tax privilege relate to this unredacted version 6 letter from Simone New (phonetic) to Katie Moby 7 (phonetic)? We don't know. We don't know how to 8 respond. If you want to tell us right now, we can 9 take that into consideration and we'll respond. But 10 without that information, we don't know. 11 Which one of the Federal Rules of Civil 12 Procedure do you think is keeping you from providing 13 that document? We want to work with you to work 14 this out, and I feel like you're really you're not 15 working with us at all. 16 MS. PLESSMAN: Well, I disagree. I 17 think we should just start by you laying out your 18 position for the -- with the central objections and 19 what specifically have you done and go through and 20 say you don't understand this, you don't understand 21 that, you don't understand this. 22 Rather than putting me on the spot when 23 you haven't identified what you don't understand and 24 what you think is appropriate and then making me 25 answer, I think you should go through and tell us</p>	<p style="text-align: right;">Page 28</p> <p>1 something else that we would have expected you to 2 offer and meet and confer to say we know that you 3 have an issue with this term or this definition and 4 so we'll amend our request to make that clear or 5 whatever. Those kinds of things. Or if there are 6 objections that are particularly confusing or if 7 this is something that may have a basis in the law 8 or it violates the rules, you can identify those and 9 we can look into it. We're happy to consider all of 10 those arguments. 11 But it just -- it feels a little bit 12 like what you are trying to do is turn this into 13 some sort of a document game where what you really 14 want to do is file another motion and you have a 15 court reporter on and I am the only one actually 16 speaking. I'm not sure how to resolve that. 17 MR. WOOD: Well, I'm not sure we're 18 actually making any progress. It seems clear to 19 me -- this is John Wood. What seems clear to me, 20 you're not willing to talk through any of these 21 right now. 22 MS. PLESSMAN: Well, that's not true at 23 all. I'm actually saying -- I'm just asking you to 24 explain what it is about our objections and which 25 aspect of our objections you think are inappropriate</p>

<p style="text-align: right;">Page 29</p> <p>1 or confusing or aren't supported by the law. And it 2 sounds really like that you guys are the ones that 3 don't want to do that. And I just -- I try and make 4 a little bit on -- I have never had anyone 5 propose -- the nature of these meet and confers are 6 supposed to be -- it's just -- it's -- what this 7 really feels like is that you wanted to have a court 8 reporter on to set up some sort of motion to compel 9 rather than actually set forth your positions with 10 respect to our objections and describe what it is 11 that you either agree with or disagree with with 12 respect to our objections. 13 And I just think that that -- that is 14 not -- that is not what meet and confers are 15 supposed to be, where the party that's filed a 16 motion for a protective order, a motion to stay, 17 filed full objections, and then now the only ones 18 then, again, explaining each objection that we 19 already think is appropriate without hearing from 20 you first as to why you think that they're not. 21 MR. WOOD: Well, the reason we have the 22 court reporter is because we had an issue on a 23 previous meet and confer where we completely heard 24 two different things and so we are trying to avoid 25 that problem.</p>	<p style="text-align: right;">Page 31</p> <p>1 the tax privilege is applicable here, then we would 2 like to consider it, but you didn't state anything. 3 So you're asking us to respond to something you 4 didn't state. And we could go down each one that 5 you didn't state with specificity. If you'd like to 6 respond to that one, we're happy to discuss it with 7 you. 8 MS. PLESSMAN: Yeah. That's -- that's 9 the sort of thing that if there are other things, 10 like the tax privilege or other objections that you 11 feel like we need to further explain and if there's 12 some basis in the law or in the rules that you think 13 that we need to further state "X", "Y", and "Z" on 14 any given thing, that we're willing to listen to 15 that. 16 So you mentioned the tax privilege, so 17 we are willing to look into that and see whether or 18 not we can either remove that objection or whether 19 or not we need to provide additional specificity, 20 and we'll consider that. 21 MR. WOOD: When will you get back to us 22 on that, Alison? 23 MS. PLESSMAN: Well, why don't we go 24 through the rest of your issues. Again, part of 25 this is considering all of this in connection with</p>
<p style="text-align: right;">Page 30</p> <p>1 We already have a motion to compel on 2 file. We don't need anything else. That motion to 3 compel is fully briefed so I'm not sure what you're 4 talking about there. 5 We're trying to keep things clear and we 6 really are trying to work this out so we can move 7 forward and have some documents produced in the case 8 and that's our goal is to move discovery along 9 and -- but I don't think we are making any progress. 10 So I think for now we -- I think we're probably done 11 with this call. 12 MS. PLESSMAN: I guess I just want the 13 record to be clear then. Are you not -- are you not 14 willing to explain what you believe is -- which 15 objections you believe have merit and which don't or 16 offer any sort of compromise? Because that's what I 17 would expect. That's what I would have expected 18 when you requested to meet and confer. And I just 19 want that to be clear. 20 MR. WOOD: Well, let's do one then. We 21 do not think the tax privilege states with 22 specificity the reason why you're withholding 23 documents based on the tax privilege. We think 24 that's in violation of the rules. 25 And so if you would like to explain why</p>	<p style="text-align: right;">Page 32</p> <p>1 the pending motions and what your expectations are 2 and what you're offering in response and what your 3 position is with respect to these, rather than just 4 one-off issues on the tax privilege. 5 I think we should just go through and if 6 you have particular objections like that -- or not 7 objections, but responses to our objections, if you 8 really want to understand the basis of a particular 9 objection or wonder if -- or propose that we remove 10 it, that's what we would like to hear. 11 MR. ASHLEY: Well, maybe to make this a 12 little bit more organized, since we're on 96, start 13 with number 96. And your first objection we've 14 already discussed -- this is Matt, by the way -- and 15 that is that Broadcom wants a protective order 16 governing confidential information which I think we, 17 other than the source code provision, pretty much 18 agreed to yesterday. So that should resolve the 19 objection based on disclosure of confidential and 20 proprietary information. That's the very first 21 objection in RFP 96. Does that sound right, Alison? 22 MS. PLESSMAN: Well, yes. I mean, we 23 don't -- I don't know what you mean "does that sound 24 right?" We talked about the protective code 25 yesterday. I think we've made significant progress</p>

<p style="text-align: right;">Page 33</p> <p>1 and we're -- we should be able to reach agreement on 2 that fairly soon, I hope. I don't think that there 3 are going to be huge outstanding issues. We don't 4 have it in place yet. I imagine there might be 5 some -- some additional work on it, but that is one 6 of the bases, and I think I've already explained 7 with respect to this issue this is something that I 8 think Extreme should be involved in because this 9 is -- this involved, again, a pending -- a document 10 that includes that there are confidentiality issues 11 with Extreme and I think they should be involved in 12 the conversation. So I think it makes sense to 13 focus on the other requests.</p> <p>14 MR. ASHLEY: You brief this request, so 15 can we go to the next objection. The next objection 16 is "Broadcom further objects to this request to the 17 extent the documents sought are not in Broadcom's 18 possession, custody, or control, and are in the 19 possession, custody, or control of third parties." 20 Again, this is Matt. Our position is that it's a 21 letter sent from Broadcom so it's in Broadcom's 22 possession, custody, or control.</p> <p>23 So can we agree that that's not an 24 objection upon which you guys are basing withholding 25 a document?</p>	<p style="text-align: right;">Page 35</p> <p>1 MS. PLESSMAN: Well, yeah. I need to -- 2 I just need to take a look at it. I don't remember 3 who Simone is or who she worked for. But I would 4 have to go back and look at it.</p> <p>5 MR. ASHLEY: Okay. And then the next 6 objection is the reference to the motion to stay and 7 the motion for a protective order which is pending, 8 and I think we've already discussed that.</p> <p>9 The next objection is with respect to 10 lack of personal -- alleged lack of personal 11 jurisdiction. The parties actually disagree on 12 that.</p> <p>13 But are you withholding documents on the 14 basis of that objection? We don't think that's 15 appropriate.</p> <p>16 MS. PLESSMAN: We have a pending motion 17 to stay. All of these issues have been briefed, so 18 I don't think we need to revisit this ground. We 19 have a pending motion to stay. We have a pending 20 motion for a protective order. We have a pending 21 motion to compel. So I think those are -- you know 22 our position on them well.</p> <p>23 MR. ASHLEY: But what I don't know is 24 whether or not Broadcom is actually withholding this 25 document on the basis that it is asserting a</p>
<p style="text-align: right;">Page 34</p> <p>1 MS. PLESSMAN: Well, yeah. I mean, I 2 would have to actually look at the -- I would have 3 to actually look at the letter. I don't know that 4 if it's -- I would have to look at who was 5 actually -- who Simone actually worked for. I don't 6 recall.</p> <p>7 MR. ASHLEY: So that objection is still 8 in play?</p> <p>9 MS. PLESSMAN: Yeah. I mean, like I 10 said, we're willing to reconsider it and go -- and 11 go look and see if that's -- if that's a basis that 12 can be removed. But I don't really think this is 13 going to be -- I don't think that this document in 14 the end will be an issue once all the other -- all 15 the motions and the protective order in place and I 16 have an opportunity to talk to Extreme about it. I 17 don't expect it to be a huge impediment, but I do 18 want to be able to talk to them first.</p> <p>19 MR. ASHLEY: We covered that. I'm just 20 making sure I'm narrowing the issues. So I 21 understand that you want to talk to Extreme. I'm 22 just asking about the possession, custody, or 23 control. And that's something else you need to look 24 into as well, whether Broadcom actually had 25 possession, custody, or control of that letter?</p>	<p style="text-align: right;">Page 36</p> <p>1 personal jurisdiction defense? Is it doing that?</p> <p>2 MS. PLESSMAN: Well, and that's part of 3 the motion to stay. The motion to stay discovery in 4 part.</p> <p>5 MR. ASHLEY: Is that yes? I just don't 6 know. I can't tell whether --</p> <p>7 MS. PLESSMAN: And motion for a 8 protective order. So yeah, that would all be -- 9 again, this has all been briefed. I don't want to 10 revisit arguments that have already been briefed. 11 Again, I feel like this is ground well covered.</p> <p>12 If you want to go through and explain 13 what you have a problem with and where you think the 14 objections are improper, that's fine. But to make, 15 you know -- to go into this, like, rehashing things 16 that have already been briefed, unless you're 17 changing your position or you want to ask us here 18 have you considered this case or this law, other 19 than what we've already set forth fully and briefed, 20 otherwise we're just sort of spinning our wheels on 21 things that we've already laid out in items 22 completely.</p> <p>23 MR. ASHLEY: Well, I don't think the 24 brief addressed this issue. Broadcom asked 25 plaintiffs to agree that Broadcom responding to our</p>

<p style="text-align: right;">Page 37</p> <p>1 written discovery, that the plaintiffs would not 2 argue that that waived Broadcom's personal 3 jurisdiction defense and we gave that agreement and 4 the parties informed the court of that agreement. 5 And all I'm asking is whether or not 6 Broadcom is actually withholding this document on 7 the basis that Broadcom is asserting a personal 8 jurisdiction defense? And I don't think that's been 9 briefed. I think it's a pretty simple question. 10 MS. PLESSMAN: Yes, I think it has been 11 briefed. It has been briefed. It's part of the 12 issue again. This is not -- we're not -- we're not 13 covering any new ground here. It has been 14 addressed. The one-sided discovery issue has been 15 gone -- we've gone over that. It's not simply an 16 issue, as you know, of you agreeing that if we 17 respond to your hundreds of requests that you won't 18 argue waiver. It's the fundamental unfairness of 19 your position and that is the subject of a motion so 20 and that has been briefed. 21 So why don't we focus on some of the new 22 topics and whether or not you have particular -- if 23 you want to support requests for production 24 number 92 and why you think it's clear and why you 25 don't think it's overbroad and what -- other than</p>	<p style="text-align: right;">Page 39</p> <p>1 Broadcom, Inc. the right to use, copy, license, 2 sell, transfer, prepare derivative works of, or 3 distribute SNMP Research software. 4 And one of your objections is that the 5 terms transfer and distribute are vague, and we 6 don't understand why those words are vague. 7 MS. PLESSMAN: So how do you define it? 8 I think that's the easiest way. 9 MR. ASHLEY: We could agree that you 10 could look it up in the dictionary. 11 MS. PLESSMAN: Is that your proposal, 12 that you amend the request so that the definitions 13 are whatever they are in the Webster's Dictionary? 14 MR. ASHLEY: I do not define terms. 15 They're just words in the English language and 16 that's generally how you define them, by the 17 dictionary. 18 MS. PLESSMAN: Okay. Well, that's -- if 19 that's what you're proposing and it's just a 20 dictionary definition without any further 21 explanation of how those terms might have meaning in 22 the particular context here and what you're looking 23 for, I don't know that that -- I don't know that 24 that provides any additional clarity, but I suppose 25 we can look up what the definition is and see if</p>
<p style="text-align: right;">Page 38</p> <p>1 these pending motions, what is it that you either 2 disagree with in terms of our objections or agree 3 with? And are you willing to amend any of these 4 requests, that kind of thing. Again, it just -- it 5 just feels as if you're trying to put me on the spot 6 rather than setting forth your position on these 7 requests and supporting your requests, you know. I 8 just think, for some reason -- I don't know why 9 we're resisting or why you're resisting just going 10 through starting with request for production number 11 92 and telling us what you think is wrong and why 12 you think we should amend them. 13 MR. ASHLEY: I was just going to finish 14 up 96 since we were on it. We'll certainly turn to 15 92. 16 MS. PLESSMAN: I really think Extreme 17 should be part of that conversation, I don't think 18 it's worth spending a lot of time on that particular 19 request. 20 MR. ASHLEY: Okay. Would you like to 21 then go to 92, then? 22 MS. PLESSMAN: Sure. 23 MR. ASHLEY: Okay. So there's a lot of 24 objections. There's like two pages worth. But the 25 request says, quote: All documents that give</p>	<p style="text-align: right;">Page 40</p> <p>1 that helps. But I don't think that that really 2 explains what we're looking for in particular. 3 MR. WOOD: This is John Wood again. 4 Alison, what would help us, we need to understand 5 why you think transfer is vague. What is it you 6 can't understand? What do you think it implies 7 that's causing you to not be able to figure out 8 which document to produce? Because your response 9 doesn't explain why transfer is vague. And so -- 10 and we don't understand it because it seems like a 11 common word to us that's usually used in the English 12 language, much like any of the other words in here. 13 So you've got to explain to us why you 14 think it's vague or we can't -- we can't engage with 15 you to resolve this objection. Or you can just 16 remove it. 17 MS. PLESSMAN: Why don't you give me an 18 example of what you would think would constitute 19 Broadcom's -- let me see -- what kind of document 20 would give Broadcom the right to transfer software 21 but not use, copy, sell, or distribute. Like what 22 would that -- what kind of document are you talking 23 about that would encompass that? 24 MR. WOOD: This is John Wood again. 25 First of all, that's not at all what we're saying,</p>

<p style="text-align: right;">Page 41</p> <p>1 that it would only be that one thing, but you, 2 obviously, could have a license agreement that gives 3 you only one right, but we're saying it's any of 4 those things, right? A document that gives you the 5 right to do any of those things, not just one. 6 MS. PLESSMAN: Right. But how are you 7 thinking of transfer? How is transfer distinct from 8 the other words? 9 MR WOOD: Are you saying that your 10 confusion is you think the word use and transfer are 11 the same? 12 MS. PLESSMAN: I'm just wondering -- I'm 13 wondering what you mean by it. What kind of 14 document -- the request is -- picking up the other 15 words, it would be all documents that give Broadcom, 16 Inc. the right to transfer your software to 17 unidentified -- transfer where? To who? I don't 18 know what you mean by that. What kind of document 19 are you contemplating that would give Broadcom the 20 right to transfer software? Is that -- are you 21 looking for -- 22 MR. WOOD: The license agreement. 23 MR. PLESSMAN: Are you proposing that 24 this request be read to say -- identify all license 25 agreements concerning --</p>	<p style="text-align: right;">Page 43</p> <p>1 affiliates the right to give the software to 2 somebody else? Is that what you mean by transfer? 3 MR WOOD: Yeah. Would that make it 4 clear, if we made it clear that we were talking 5 about transfer or distribute to someone else? We 6 certainly weren't talking about Broadcom 7 transferring it to themselves. So, I mean -- John 8 Wood again. 9 MR. PLESSMAN: Sorry. That's -- you 10 could transfer -- you could transfer software from 11 my desk to another room. You could -- it's not -- 12 transfer in and of itself could mean a lot of 13 different things. You could -- transfer could just 14 mean moving. 15 MR WOOD: Okay. Well, that -- this is 16 John Wood. So would that make it clearer if we said 17 transfer to a third party? Would that clear up this 18 objection? 19 MS. PLESSMAN: And do you mean by 20 physically transfer, like a physical copy of the 21 software? Is that what you're saying? 22 MR WOOD: Yeah, you're actually 23 transferring the software. Right. 24 MS. PLESSMAN: Yes. So not the right to 25 but actually physically like there's a physical</p>
<p style="text-align: right;">Page 42</p> <p>1 MR WOOD: No. 2 MS. PLESSMAN: -- SNMP user software? 3 MR. WOOD: No. It's any document that 4 gives you those rights. You could -- I mean, we may 5 call it the license agreement. You could call it 6 something else. We're not trying to name the 7 document. It's about the rights that you have in 8 the document. 9 MS. PLESSMAN: Okay. I mean, so the 10 license is already here. So that's one of the other 11 words. I guess when you say transfer, are you 12 handing software to somebody physically or 13 transferring the rights or -- 14 MR WOOD: Our request specifically talks 15 about transferring the software. 16 MS. PLESSMAN: Right. And then the 17 soft -- software has an extremely broad definition 18 which we have discussed. 19 Is there something specifically that you 20 are contemplating, the right to -- are you saying 21 the right for Broadcom to give software to somebody 22 else? There's no other person here. It doesn't say 23 to somebody or anything. 24 So is that what you're trying to get at, 25 the right? What gives Broadcom and all of its</p>	<p style="text-align: right;">Page 44</p> <p>1 object and you are physically transferring and 2 moving -- giving that to somebody else? And that's 3 not -- that's somehow exclusive of selling it to 4 them or licensing or distributing that to them? I 5 mean, that's one question. 6 How is distribute and transfer different 7 in your mind? 8 MR WOOD: Well, they can be -- this is 9 John Wood again. They could be the same thing. You 10 could think of that as two different things. 11 Sometimes distribution is not the same as transfer. 12 But I don't think there's a big difference here. 13 MS. PLESSMAN: Well, I guess that -- I 14 mean, that's part of the -- they are both new. So 15 there should be some -- there should be some. 16 THE REPORTER: I can't hear. There 17 should be some ... 18 MS. PLESSMAN: I was going to say since 19 those terms are used, I would think that they were 20 intended to have two different meanings. And I'm 21 not sure if we're talking about Broadcom physically 22 giving a copy of software to somebody, to a third 23 party, how is that different? What's the difference 24 in that -- if that's the definition you're thinking 25 of, what's the difference between transfer and</p>

<p style="text-align: right;">Page 45</p> <p>1 distribute?</p> <p>2 MR WOOD: Let's finish the first thing</p> <p>3 first.</p> <p>4 So first I asked you if we said transfer</p> <p>5 to a third party would that clear up your issue with</p> <p>6 transfer? And I don't think I ever got an answer to</p> <p>7 that. So before we --</p> <p>8 MS. PLESSMAN: Yea. I think that</p> <p>9 that -- that adding on a specific, you know, as</p> <p>10 opposed to this transferring it to a third party</p> <p>11 does clarify it but without knowing the difference</p> <p>12 between what you mean between transfer and</p> <p>13 distribute, I think that's still -- that's an added</p> <p>14 -- that adds further clarification but I still don't</p> <p>15 know what you're getting at between transfer and</p> <p>16 distribute and how they are different.</p> <p>17 MR WOOD: Well, so if we removed one of</p> <p>18 those words, would that resolve your issue?</p> <p>19 MS. PLESSMAN: Well, potentially. Like</p> <p>20 I'm saying, we're going to remove distribute?</p> <p>21 MR WOOD: Yeah, or -- or transfer. I'm</p> <p>22 just saying if your issue is there's two words</p> <p>23 there, I'm just asking if we remove one would that</p> <p>24 resolve your issue?</p> <p>25 MS. PLESSMAN: Well, I mean, I guess are</p>	<p style="text-align: right;">Page 47</p> <p>1 one -- one individual at Broadcom physically handing</p> <p>2 off the software to a third party and that's what I</p> <p>3 mean by distribute, then I think that would clarify</p> <p>4 the terms. But I guess I haven't heard -- I haven't</p> <p>5 heard that. Is that how you -- what you mean by</p> <p>6 distribute? Is that --</p> <p>7 MR WOOD: We can propose something on</p> <p>8 that. Unfortunately, we are already almost 20</p> <p>9 minutes over the time I booked, and I have another</p> <p>10 engagement I have to go to. But I think we were</p> <p>11 starting to make progress, maybe. I feel like we</p> <p>12 need to schedule about three hours maybe, instead of</p> <p>13 I've been trying to schedule an hour, hour and a</p> <p>14 half, and that's just not enough. Because we are</p> <p>15 happy to talk through all of these with you, Alison,</p> <p>16 and try and work them out.</p> <p>17 MS. PLESSMAN: Yeah.</p> <p>18 MR WOOD: Why don't we send an email and</p> <p>19 we'll try in the next couple of days schedule a</p> <p>20 longer block of time so we can get through because</p> <p>21 it's taken us 30 minutes just to talk about transfer</p> <p>22 and distribute.</p> <p>23 MS. PLESSMAN: I agree. I think what</p> <p>24 makes sense is for you to send a letter explaining</p> <p>25 what you actually think is improper about our</p>
<p style="text-align: right;">Page 46</p> <p>1 you saying that they are the same thing? Like say</p> <p>2 you remove transfer but you leave distribute, then I</p> <p>3 don't know that you're attributing the same meaning</p> <p>4 to distribute as what you've just explained you mean</p> <p>5 by transfer or an actual physical transfer like</p> <p>6 almost like a physical transfer between one person</p> <p>7 and another.</p> <p>8 MR WOOD: Okay. I'm just -- we're</p> <p>9 willing to simplify the request if it'll remove the</p> <p>10 ambiguity so that you can then answer it, and so I'm</p> <p>11 offering to remove one of those words. I'm asking</p> <p>12 you if that will resolve your issue? I'm trying to</p> <p>13 figure out if there's anything that will resolve</p> <p>14 your issue.</p> <p>15 MS. PLESSMAN: I mean, just to be clear,</p> <p>16 because I feel like there's confusion, there's</p> <p>17 always the overarching issue of the pending motions</p> <p>18 and the one-sided discovery.</p> <p>19 But with respect to these additional</p> <p>20 line item issues, I think it would -- explaining</p> <p>21 what you mean by those words helps. But like, for</p> <p>22 example, you took out transfer but left in</p> <p>23 distribute but you haven't told me what you mean by</p> <p>24 distribute, or what the difference between the two</p> <p>25 is. If you said by distribute, I mean a physical or</p>	<p style="text-align: right;">Page 48</p> <p>1 objections so that we know what they are. And this</p> <p>2 is exactly the sort of thing that we want to avoid</p> <p>3 by filing a motion for a protective order, a motion</p> <p>4 to stay, not spending three hours and we think that</p> <p>5 the discovery is completely inappropriate in the</p> <p>6 first place.</p> <p>7 So that's -- it's -- we're not going to</p> <p>8 spend hours upon hours when you could just as easily</p> <p>9 have initially set forth your position and we can go</p> <p>10 through this just more efficiently rather than --</p> <p>11 because going into the call, we don't know whether</p> <p>12 or not you agree and understand our objections or</p> <p>13 have a problem with every single one of them or are</p> <p>14 willing to make an adjustment here or there, and we</p> <p>15 end up just wasting a lot of time because we're</p> <p>16 coming in without -- I mean, we didn't even -- we</p> <p>17 didn't even understand going into the call that you</p> <p>18 weren't really going to reconsider your position</p> <p>19 with respect to waiver. So I just -- I don't want</p> <p>20 to waste three hours when we could -- we could</p> <p>21 streamline some of this.</p> <p>22 My understanding what was your actual --</p> <p>23 what you actually have a problem with with respect</p> <p>24 to our objections. And if it's every single</p> <p>25 objection you disagree with, then that should be an</p>

<p>Page 49</p> <p>1 easy letter to write. But if there are specific 2 objections that you really want to understand or you 3 have case law saying that this particular objection 4 is inappropriate, I think it will make it a lot more 5 efficient to get that in advance than to sit here 6 with the court reporter and try to do this on the 7 fly when I have no idea what your -- what your 8 issues are.</p> <p>9 MR WOOD: Well, we'll talk about that 10 and get back to you. This is John Wood. Okay.</p> <p>11 MS. PLESSMAN: Okay. Thanks.</p> <p>12 MR WOOD: Thank you for the call and 13 your time.</p> <p>14 MS. PLESSMAN: Okay. Thank you.</p> <p>15 MR WOOD: Thank you.</p> <p>16 MR. ASHLEY: Thank you. Bye bye.</p> <p>17 (WHEREUPON, the foregoing proceedings 18 were concluded at 7:23 p.m.)</p> <p>19 20 21 22 23 24 25</p>	
<p>Page 50</p> <p>1 REPORTER'S CERTIFICATE 2 3 STATE OF TENNESSEE 4 5 COUNTY OF DAVIDSON</p> <p>6 I, Deborah H. Honeycutt, Licensed Court 7 Reporter, with offices in Hermitage, Tennessee, 8 hereby certify that I reported the foregoing 9 hearing of a telephonic conversation by machine 10 shorthand to the best of my skills and abilities, 11 and thereafter the same was reduced to typewritten 12 form by me. I am not related to any of the parties 13 named herein, nor their counsel, and have no 14 interest, financial or otherwise, in the outcome of 15 the proceedings.</p> <p>16 I further certify that in order for this 17 document to be considered a true and correct copy, 18 it must bear my original signature, and that any 19 unauthorized reproduction in whole or in part 20 and/or transfer of this document is not authorized, 21 will not be considered authentic, and will be in 22 violation of Tennessee Code Annotated 39-14-104, 23 Theft of Services.</p> <p>24 25</p> <p>22 Deborah H. Honeycutt, LCR 23 Elite-Brentwood Reporting Services 24 Associate Reporter 25 Notary Public State of Tennessee</p> <p>My Notary Public Commission Expires: 07/09/24 LCR # 472 - Expires: June 30, 2022</p>	

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